



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsitel@jsitel.com

June 30, 2015

ACCEPTED/FILED

JUN 30 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Valley Telephone Cooperative, Inc. (TX)  
Study Area Code 442159**

Dear Ms. Dortch:

On behalf of Valley Telephone Cooperative, Inc. ("Company"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) of its Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

No. of Copies rec'd 043  
List ABCDE

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58**  
**2015 ETC Annual Report of Valley Telephone Cooperative, Inc. (TX)**  
**Study Area Code 442159**  
**Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Valley Telephone Cooperative, Inc. (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")<sup>4</sup> and must also report outages, both of which are contained in attachments to the 2015 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

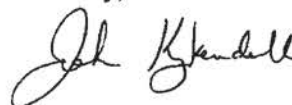
the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.<sup>6</sup> The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>6</sup> See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.



**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**
**REDACTED FOR PUBLIC INSPECTION**
**FCC Form 481  
OMB Control No. 3060-0060/OMB Control No. 3060-0819  
July 2013**

<010> Study Area Code	442159	<b>ACCEPTED/FILED</b>
<015> Study Area Name	VALLEY TEL CO-OP -TX	
<020> Program Year	2016	<b>JUN 30 2015</b>
<030> Contact Name: Person USAC should contact with questions about this data	Paula Smith	
<035> Contact Telephone Number: Number of the person identified in data line <030>	9566421194 ext.194	<b>Federal Communications Commission Office of the Secretary</b>
<039> Contact Email Address: Email of the person identified in data line <030>	paula.smith@vtx1.net	

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313 Completion Required</b>	<b>54.422 Completion Required</b>
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<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 300px;"></div> (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> 442159tx510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 40px; width: 300px;"></div> 442159tx610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 300px;"></div>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

442159txl12.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]







<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

[illegible]



**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<b>&lt;010&gt; Study Area Code</b>	442159
<b>&lt;015&gt; Study Area Name</b>	VALLEY TEL CO-OP -TX
<b>&lt;020&gt; Program Year</b>	2016
<b>&lt;030&gt; Contact Name - Person USAC should contact regarding this data</b>	Paula Smith
<b>&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;</b>	9566421194 ext.194
<b>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;</b>	paula.smith@vtx1.net

**<910> Tribal Land(s) on which ETC Serves**

**<920> Tribal Government Engagement Obligation**

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.**
- <922> Feasibility and sustainability planning;**
- <923> Marketing services in a culturally sensitive manner;**
- <924> Compliance with Rights of way processes**
- <925> Compliance with Land Use permitting requirements**
- <926> Compliance with Facilities Siting rules**
- <927> Compliance with Environmental Review processes**
- <928> Compliance with Cultural Preservation review processes**
- <929> Compliance with Tribal Business and Licensing requirements.**

Select Yes or No or Not Applicable



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0586/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

442159tx1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

<b>(2000) Price Cap Carrier Additional Documentation</b> <b>Data Collection Form</b> <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP - TX
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	PAULIA SMITH
<035> Contact Telephone Number - Number of person identified in data line <030>	3366421134 ext. 134
<039> Contact Email Address - Email Address of person identified in data line <030>	paulia.smith@vtxi.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)iii)

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))**

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

**Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting (47 CFR § 54.313(e))**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information



**REDACTED FOR PUBLIC INSPECTION**

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0885/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP -TX
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paula Smith
<035> Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext. 194
<039> Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxi.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

442159tx3010.pdf

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

442159tx3012.pdf

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  
(3014) If yes, does your company file the RUS annual report

(Yes/No)

(Yes/No)



Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)



- (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows



- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

442159tx3017.pdf

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No)



If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications



- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows



- (3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit



If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,



- (3023) Underlying information subjected to a review by an independent certified public accountant



- (3024) Underlying information subjected to an officer certification.



- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(2000) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0985/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP -TX
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paula Smith
<035> Contact Telephone Number - Number of person identified in data line <030>	956421194 ext. 194
<039> Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

## Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service (TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

**THIS INFORMATION HAS  
BEEN REDACTED**

REDACTED FOR PUBLIC INSPECTION

Name of Attached Document Listing Required Information

<b>Certification - Reporting Carrier Data Collection Form</b>	<b>ECC Form 481</b> OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP -TX
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paula Smith
<035> Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039> Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: VALLEY TEL CO-OP -TX	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2015
Printed name of Authorized Officer: David Osborn	
Title or position of Authorized Officer: CEO	
Telephone number of Authorized Officer: 9566421124 ext.	
Study Area Code of Reporting Carrier: 442159	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0618 July 2013
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<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP -TX
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paula Smith
<035> Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext .194
<039> Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and  
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY



REDACTED FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

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**<b2>**

**<b3>**

**<b4>**

<c1>

<c2>

<d>

**<e>**

[illegible]

**VALLEY TELEPHONE COOPERATIVE, INC.**

**Annual 54.313 Report of High-Cost Recipient**

**Satisfaction of Consumer Protection and Service Quality Standards**

Consumer Protection

In accordance with § 54.313 (a)(4), Valley Telephone Cooperative, Inc. complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

Service Quality Standards

In accordance with § 54.313 (a)(5), Valley Telephone Cooperative, Inc. is required to meet the service standards of the State of Texas as promulgated in the Texas PUC Substantive Rule 26.54 Quality of Service Administrative Rules 860-034-0390, Retail Telecommunications Service Standards for Small Telecommunications Utilities.

## VALLEY TELEPHONE COOPERATIVE, INC.

### Annual § 54.313 Report of High-Cost Recipient

#### Current Ability to Remain Functional in Emergency Situations

In accordance with § 54.313 (a)(6), Valley Telephone Cooperative, Inc.'s network has the following safeguards built in to ensure provision of telephone service during emergency situations:

##### Back-up Power –

All remotes (building and cabinets) within the Valley Telephone Cooperative, Inc. network are monitored by the Network Operations Center on a 365 days a year; 24 hours a day basis.

##### Switches – stand alone and/or host:

All Switches in Network are located in permanent buildings with DC battery capacity and generators powered by diesel fuel. Every location has enough battery capacity for a minimum of 8 hours of power and diesel fuel to power the on-site generator for a minimum of 24 consecutive hours. Many of the larger sites have capacity of 48 hours for diesel fuel. Generator testing and diesel fuel status is checked weekly for all sites in the network.

##### Remote Central Offices:

Same as above for all buildings whether it is a remote or main site.

##### Subscriber carrier (DLC, AFC, OPM, etc.):

All remote DLC sites that are in stand-alone cabinets have at least 6 hours of continuous battery life in the event of an outage. All remote cabinets have portable generator hookups in the case power is out long enough to drain the batteries. There are over 150 remotes with the Valley Telephone Cooperative, Inc. network.

##### Network Interface Devices (NIDs):

Valley Telephone Cooperative, Inc. serves some customers with metallic (copper) connections to the Central Office and the NID does not require any power for operation.

Valley Telephone Cooperative, Inc. has other customers served by non-metallic (fiber optic) connections to the Central Office. These customers' fiber NIDs are battery powered in case of emergency. The batteries are rated to last a minimum of 24 hours with no use of the NID and 8 hours with constant use. Tests have been conducted in-house to confirm this.



Current Ability to Remain Functional in Emergency Situations (continued)

Ability to reroute traffic around damaged facilities:

Valley Telephone Cooperative, Inc. has built redundant facilities between its exchanges and / or to its connecting company / toll tandem. These redundant facilities are in the form of SONET rings and redundant Ethernet transport with alternate physical facilities and meet points between VTX Telecom, AT&T, and Verizon, its interconnection to the Public Switched Telephone Network.

Capability to manage traffic spikes resulting from emergency situations:

Valley Telephone Cooperative, Inc. has sufficient switching and transport capacity to manage traffic spikes resulting from emergency situations. Valley Telephone Cooperative, Inc. takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations.

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings Including Voice Rate Data  
Data Collection Form

FCC Form 481

OMB Control No. 3080-0086/OMB Control No. 3050-0819  
July 2013

<010> Study Area Code 442159  
<015> Study Area Name VALLEY TEL CO-OP -TX  
<020> Program Year 2016  
<030> Contact Name - Person USAC should contact regarding this data Paula Smith  
<035> Contact Telephone Number - Number of person identified in data line <030> 9566421194 ext.194  
<039> Contact Email Address - Email Address of person identified in data line <030> paula.smith@vtx1.net

<701> Residential Local Service Charge Effective Date 1/1/2015  
<702> Single State-wide Residential Local Service Charge

<703>

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State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
TX	Annarose		FR	16.15	0.0	0.6	0.0	16.75
TX	Artesia Wells		FR	16.15	0.0	0.6	0.0	16.75
TX	Concepcion		FR	16.15	0.0	0.73	3.5	20.38
TX	El Sauz		FR	16.15	0.0	0.73	3.5	20.38
TX	Encino		FR	16.15	0.0	0.61	0.43	17.19
TX	Fowlerton		FR	16.15	0.0	0.6	0.0	16.75
TX	Hargill		FR	16.15	0.0	0.62	0.68	17.45
TX	Lasara		FR	16.15	0.0	0.66	1.66	18.47
TX	McCook		FR	16.15	0.0	0.73	3.5	20.38
TX	Millet		FR	16.15	0.0	0.64	1.28	18.07
TX	Mirando City		FR	16.15	0.0	0.64	1.19	17.98
TX	Port Mansfield		FR	16.15	0.0	0.6	0.0	16.75
TX	San Isidro		FR	16.15	0.0	0.64	1.17	17.96
TX	San Miguel		FR	16.15	0.0	0.65	1.5	18.3
TX	San Perlita		FR	16.15	0.0	0.61	0.29	17.05
TX	Stillman		FR	16.15	0.0	0.63	0.93	17.71
TX	Tilden		FR	16.15	0.0	0.73	3.5	20.38

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
	TX	Annarose	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Artesia Wells	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Concepcion	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	El Sauz	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Encino	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Fowlerton	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Hargill	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Lasara	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	McCook	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Millet	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Mirando city	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Port Mansfield	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	San Isidro	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	San Miguel	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	San Perlita	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Stillman	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Tilden	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Annarose	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Artesia Wells	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Concepcion	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	El Sauz	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A



REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0596/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 442159  
<015> Study Area Name VALLEY TEL CO-OP -TX  
<020> Program Year 2016  
<030> Contact Name - Person USAC should contact regarding this data Paula Smith  
<035> Contact Telephone Number - Number of person identified in data line <030> 9566421194 ext.194  
<039> Contact Email Address - Email Address of person identified in data line <030> paula.smith@vtxl.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	TX	Encino	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Fowlerton	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Hargill	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Lasara	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	McCook	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Millet	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Mirando City	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Port Mansfield	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	San Isidro	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	San Miguel	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	San Perlita	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Stillman	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Tilden	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Annarose	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Artesia Wells	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Concepcion	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	El Sauz	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Encino	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Fowlerton	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Hargill	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Lasara	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 442159  
<015> Study Area Name VALLEY TEL CO-OP -TX  
<020> Program Year 2016  
<030> Contact Name - Person USAC should contact regarding this data Paula Smith  
<035> Contact Telephone Number - Number of person identified in data line <030> 9566421194 ext.194  
<039> Contact Email Address - Email Address of person identified in data line <030> paula.smith@vtcl.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
	TX	McCook	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Millet	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Mirando City	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Port Mansfield	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	San Isidro	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	San Miguel	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	San Perlita	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Stillman	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Tilden	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Annarose	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Artesia Wells	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Concepcion	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	El Sauz	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Encino	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Fowlerton	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Hargill	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Lasara	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	McCook	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Millet	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Mirando City	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Port Mansfield	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<711>	<41>	<42>	<61>	<62>	<6>	<41>	<42>	<43>	<44>
State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}	

[illegible]



REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<810>	Reporting Carrier	Valley Telephone Cooperative, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Valley Telephone Cooperative, Inc.

[illegible]

## Valley Telephone Cooperative, Inc.

### Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Valley Telephone Cooperative's tariff(s) on file with the Public Utility Commission of Texas. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates<sup>(1)(2)</sup>:

<b>Exchange Name</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>
Annarose	\$16.15	\$0.00
Artesia Wells	\$16.15	\$0.00
Concepcion	\$16.15	\$3.50
El Sauz	\$16.15	\$3.50
Encino	\$16.15	\$0.43
Fowlerton	\$16.15	\$0.00
Hargill	\$16.15	\$0.68
Lasara	\$16.15	\$1.66
McCook	\$16.15	\$3.50
Millet	\$16.15	\$1.28
Mirando City	\$16.15	\$1.19
Port Mansfield	\$16.15	\$0.00
San Isidro	\$16.15	\$1.17
San Miguel	\$16.15	\$1.50
San Perlita	\$16.15	\$0.29
Stillman	\$16.15	\$0.93
Tilden	\$16.15	\$3.50

(1) Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Texas Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

(2) Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

**VALLEY TELEPHONE COOPERATIVE, INC.**  
Member Services Tariff

**SECTION 1**  
Original Page 9

**LOCAL EXCHANGE RATES AND SERVICES**

**VI. LIFELINE PROGRAM**

The Lifeline Program is a retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

**A. General**

Consumers qualifying for Lifeline Service are offered the services or functionalities enumerated in 47 Code of Federal Regulation §54.101 (relating to Supported Services for Rural, Insular and High-Cost Areas).

1. The Cooperative shall offer toll restriction at no charge to all qualifying low-income consumers at the time such consumers subscribe to Lifeline Service. If the consumer elects to receive toll restriction, that service shall become part of the consumer's Lifeline Service.
2. A customer otherwise eligible to receive the Lifeline Service shall not be prohibited from obtaining and using telecommunications equipment and services designed to aid such customer in utilizing qualifying telecommunications services.
3. Lifeline Service rate reductions only apply to basic service and do not apply to non-basic services such as long distance service, which may or may not be tariffed. Customers may subscribe to non-basic services, including bundled services where available, at their discretion, although the Lifeline Service reduction only applies to the basic service charge in the bundled service.
4. The Lifeline Service rate reductions do not apply to service connection charges as set forth in Section 5 of this tariff.
5. Lifeline Service will not be available on a retroactive basis except as directed by Low income Discount Administrator or the Commission.
6. The Cooperative will waive monthly number portability charges, subject to its tariff, for the Lifeline customer.



**VALLEY TELEPHONE COOPERATIVE, INC.**  
Member Services Tariff

**SECTION 1**  
Original Page 10

**LOCAL EXCHANGE RATES AND SERVICES**

**VI. LIFELINE PROGRAM (Continued)**

The Lifeline Program is retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

**B. Eligibility Requirements**

1. The discounted service will be provided for one residential telephone line per household, at the subscriber's principal place of residence.
2. The applicant must certify that their annual household income is at or below 150% of the federal poverty guidelines, be an eligible resident of Tribal lands, or participate in, or have a person or child who resides in the customer household who participates in a program identified in Chapter 47 of Federal Regulations §54.409 and in P.U.C. Substantive Rule §26.412 regarding consumer qualification for Lifeline.
3. Procedures for Establishing Lifeline Discounts
  - a. Consumers within the Cooperative's service area identified as eligible for Lifeline Service by the Texas Low-Income Discount Administrator (LIDA) through the automatic enrollment process under Commission Substantive Rule §26.412, shall be provided Lifeline Service discounts, unless the Cooperative receives a customer request to be excluded from such discounts.
  - b. The LIDA shall provide the Cooperative with an initial list of consumer eligible for Lifeline Service and shall provide an updated list to the Cooperative on a monthly basis.
  - c. Consumers who do not participate in one of the designated programs but who meet income qualifications having an income at or below 150% of the federal poverty guidelines, may establish eligibility for Lifeline Service by contacting the LIDA and receive Lifeline Service discounts within 30 days of proof of eligibility.

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**LOCAL EXCHANGE RATES AND SERVICES**

**VI. LIFELINE PROGRAM (Continued)**

**B. Eligibility Requirements (Continued)**

**3. Procedures for Establishing Lifeline Discounts (Continued)**

- d. The discontinuance of the Tel-Assistance program effective September 1, 2001 allows the Cooperative to move a Tel-Assistance customer to Lifeline Service.

**4. Provision of Service**

- a. The Cooperative shall provide Lifeline Service to all eligible consumers identified by the LIDA within its service area if the consumer is a customer of the Cooperative. Within 30 days after receipt of the list, the Cooperative shall begin reduced billing for eligible low-income consumer subscribing to qualifying services.
- b. If the eligible consumer changes the telephone service to qualifying services or initiates new qualifying service, the Cooperative shall begin reduced billing at the time the change of service becomes effective or at the time the new service is established.
- c. The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.
- d. The Cooperative has provided a confidentiality agreement to the LIDA providing Lifeline Service specifying the use of confidential client information is solely for providing Lifeline Service.

**C. Deposit Requirements**

The deposit requirement will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Restriction Service.

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**LOCAL EXCHANGE RATES AND SERVICES**

**VI. LIFELINE PROGRAM (Continued)**

The Lifeline Program is retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

**D. Lifeline Service Discounts**

1. Eligible consumers who subscribe to Lifeline Service will receive the following discounts:
  - a. Federal Lifeline support amount. The Cooperative shall grant qualifying low-income consumer's support of \$9.25 per month or equal to the support amount as directed by the Federal Communications Commission in Chapter 47 of the Code of Federal Regulations regarding Lifeline Support.
  - b. State Support Amount. The Cooperative shall grant qualifying low-income consumers the state-approved reduction of up to \$3.50 in the monthly amount of intrastate charges due.

**E. Service Charges**

1. Service Charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
2. Service Charges apply when:
  - a. At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.
  - b. A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangement which preclude Lifeline Service eligibility.
  - c. New residential applicants (those without existing local exchange access service) eligible for the Lifeline Program will be subject to applicable service charges as specified in Section 5 of this tariff.
3. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges.

**F. Payments and Disconnection of Service**

1. The Cooperative may not disconnect Lifeline Service for nonpayment of toll charges.
2. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Cooperative's customers.



**Valley Telephone Cooperative, Inc. (SAC 442159)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Valley Telephone Cooperative, Inc. hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.



**Valley Telephone Cooperative, Inc. (SAC 442159)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions<sup>1</sup> to which the ETC newly began providing broadband service. VTCI hereby provides the FCC with a list of community anchor institutions to which it newly began providing access to broadband service in calendar year 2014.

Number	Name	Address
1	TEXAS A&M UNIVERSITY	410 Airport RD, Port Mansfield Texas
2	THE UNIVERSITY OF TX BROWNSVILLE	410 Airport RD, Port Mansfield Texas
3	WILLACY COUNTY LASARA FIRE DEPT.	6081 6th St, Lasara Texas

<sup>1</sup> The FCC has defined community anchor institutions in Section 54.5 of its Rules as "schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities."

REDACTED FOR PUBLIC INSPECTION

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**